

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

STACEY STANTON,

Plaintiff,

v.

Civ. Action No. 04-10751-FDS

METRO CORP.,

Defendant.

LOCAL RULE 16.1 JOINT STATEMENT

Pursuant to Local Rule 16.1(D), the parties have conferred and jointly propose the following:

I. Discovery Plan and Dispositive Motion Schedule

1. Initial Disclosures. Initial disclosures required by Fed. R. Civ. P.

26(a)(1) must be completed by May 30, 2006.

2. Amendments to Pleadings. Except for good cause shown, no motions seeking leave to add new parties or to amend the pleadings to assert new claims or defenses may be filed after May 16, 2006.

3. Fact Discovery – Interim Deadlines.

- a. All requests for production of documents and interrogatories must be served by October 20, 2006.
- b. All requests for admission must be served by October 20, 2006.
- c. All depositions, other than expert depositions, must be completed by October 20, 2006.

4. **Fact Discovery – Final Deadline.** All discovery, other than expert discovery, must be completed (served and responded to) by November 24, 2006.

5. **Status Conference.** A status conference will be held on _____.

6. **Expert Discovery:**

- a. Plaintiff's trial experts must be designated, and the information contemplated by Fed. R. Civ. P. 26(a)(2) must be disclosed, by December 1, 2006.
- b. Plaintiff's trial experts must be deposed by January 12, 2007.
- c. Defendant's trial experts must be designated, and the information contemplated by Fed. R. Civ. P. 26(a)(2) must be disclosed, by January 19, 2007.
- d. Defendant's trial experts must be deposed by February 16, 2007.

7. **Dispositive Motions.**

- a. Dispositive motions, such as motions for summary judgment or partial summary judgment and motions for judgment on the pleadings, must be filed by March 23, 2007.
- b. Oppositions to dispositive motions must be filed within thirty (30) days after service of the motion.

8. **Pretrial Conference.** A pretrial conference will be held on _____ at _____ a.m./p.m.

II. **Trial By Magistrate Judge**

The parties do not consent to trial by magistrate judge at this time.

III. Local Rule 16.1(D)(3) Certifications

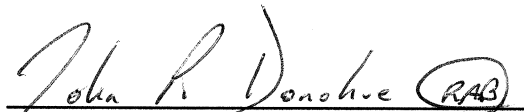
The parties shall electronically file their certifications pursuant to Local 16.1(D)(3) prior to the Scheduling Conference .

STACEY STANTON

METRO CORP.

By her attorneys,

By its attorneys,



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Dated: May 5, 2006